



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

SME  
F. #2019R01145

*271 Cadman Plaza East  
Brooklyn, New York 11201*

November 5, 2020

By ECF

The Honorable Pamela K. Chen  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Bo Mao  
Criminal Docket No. 19-00392 (PKC)

Dear Judge Chen:

The parties write to confirm their availability for jury selection and trial in the above-referenced matter on July 6, 2021. The parties have conferred and jointly request the following pre-trial schedule:

- Pre-trial motions due: January 11, 2021
- Pre-trial motions responses due: February 8, 2021
- Pre-trial motions replies (if any) due: March 8, 2021
- CIPA 4 due: January 11, 2021
- Government expert disclosure due: March 15, 2021
- Defense expert disclosure due: April 12, 2021
- Government 3500/exhibits due: May 18, 2021
- Motions in limine due: June 2, 2021
- Responses to motions in limine due: June 23, 2021
- Defense witness list/exhibits due: June 14, 2021
- Government motions in limine regarding defense witnesses/exhibits due: June 21, 2021
- Defense response to any motions in limine regarding defense witnesses/exhibits due: June 28, 2021

- Oral argument on all motions in limine: June 30, 2021 (or on another day determined by the Court).

Respectfully submitted,  
SETH D. DuCHARME  
Acting United States Attorney

By:           /s/ Sarah M. Evans            
Alexander A. Solomon  
Sarah M. Evans  
Assistant U.S. Attorneys  
(718) 254-7000

Cc: Defense counsel (by ECF)